

## **REMARKS**

Claims 1-8, 10, and 12-67 remain pending in the present application. The claims have been amended for the sake of clarity.

### **Claim Rejections under 35 U.S.C. §112**

Claims 1, 3-8, 10-20, 22-28, 30-33, 35-40, 42-50 and 52-67 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite with regard to how the phrase "an impact of the request, ...and a resolution urgency" fits in with the feature "calculating a priority value for the request." The claims have been amended to clarify these features. Therefore, Applicants respectfully request that the rejection be withdrawn.

### **Claim Rejections under 35 U.S.C. §103**

Gusick et al., Mangipudi et al., Cogger et al. and Liao et al.

Claims 1, 3-8, 10, 12-20, 22-28, 30-33, 35-40, 42-50, and 52-67 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Gusick et al. (US Pub. No. 2001/0047270) in view of Mangipudi et al (US Pat. No. 6,728,748) and Liao et al. (US Pub. No. 2004/0136379) or further in view of Cogger et al. (US Pat. No. 6,859,783). None of the references, alone or in combination, disclose or suggest "categorizing" a request including "calculating a priority value for the request, wherein the priority value is calculated in accordance with the type of request, an impact of the request, a severity of the request, a criticality of a function affected by the request, and a resolution urgency at the time of receiving the request".

Gusick et al. purports to disclose a customer service system and method to enable different parties or organizations to communicate or share customer service information with one another. In paragraph 4 of Gusick et al. it is noted that in conventional customer service systems, an organization may automate its customer service system by including access to a list of frequently asked questions (FAQ) and their corresponding answers. The organization categorizes, organizes and/or cross-references the questions and answers into a customer service knowledge base. In this manner, customers visiting the site can browse or search

the knowledge base and have their questions answered with human intervention. The system may allow a customer to browse through the customer service information or to submit a query that the manager attempts to match with customer service information contained in a knowledge database. See Para. 19. In this way, the system of Gusick et al. may categorize answers to customer questions. Gusick et al. does not disclose or suggest, however, categorizing customers' requests by calculating a priority value for the request.

Conversely, the claims as amended recite "categorizing the request" wherein categorizing the request includes "determining the type of request, calculating a priority value for the request, wherein the priority value is calculated in accordance with the type of request, an impact of the request, a severity of the request, a criticality of a function affected by the request, and a resolution urgency at the time of receiving the request" and "assigning the priority value to the request, and sending a request for resolution." The request for service may be resolved "in accordance with the priority value." In at least this way the claims may be distinguished from Gusick et al. which discloses organizing questions and answers in a knowledge base, not categorizing requests in accordance with a priority value.

Mangipudi et al. fails to fill the gaps. Mangipudi et al. purports to disclose a method and apparatus to enhance class of service (COS) at a computer architecture's application layer to permit flexible privilege based access and enable implementation of complex policies and rules for the assignment of infrastructure resources in the context of an internet or intranet. A request controller classifies network requests into high, medium or low priority based on a configured policy. The priority levels are used to determine admission priority and performance-level. Classification into the priority levels is done as a function of Source IP Address, Destination IP Address, URL, Port number, Hostname, and IP Type-of-service. It is not disclosed that classification is based on other factors. Conversely, the claims as amended recite "calculating a priority value for the request, wherein the priority value is calculated in accordance with the type of request, an impact of the

request, a severity of the request, a criticality of a function affected by the request, and a resolution urgency at the time of receiving the request”.

Liao et al. also fails to fill the gaps. Liao et al. purports to disclose a method and apparatus for allocating limited network resources, such as bandwidth and buffer memory, among various categories of data. The categories are established as “expedited forwarding” (EF), “assured forwarding” (AF), “best effort” (BE), and “lower than best effort” (LBE). Service level agreements are put in place with customers. The agreements can include guarantees as to maximum packet loss rate, maximum packet delay and maximum delay jitter. A node provisioning algorithm of Liao et al. adjusts relative service weights of one or more categories of data to decrease the risk of violation of one or more service level agreements. Liao et al. does not disclose or suggest, however, provisioning service desk capabilities to customers, where the provisioning includes “calculating a priority value for the request, wherein the priority value is calculated in accordance with the type of request, an impact of the request, a severity of the request, a criticality of a function affected by the request, and a resolution urgency at the time of receiving the request”, which is recited in the claims as amended.

In addition, Cogger et al. fails to fill the gaps. Cogger et al. purports to disclose a system and method for opening and tracking trouble tickets over the public Internet. A customer service management system may provide information included within a customer profile record to a Web enabled infrastructure which may be accessible by a remote customer workstation having a web browser and Internet access. The customer profile information may be used to populate data fields in dialogs used to open a trouble ticket. Once the trouble ticket is opened, the customer workstation may track the existing trouble tickets through a browser based graphical user interface. The graphical user interface may provide current and historical status reports of the actions taken to resolve a network event and the service organizations responsible for resolving the network event. Cogger et al. does not disclose or suggest “calculating a priority value for the request, wherein the priority value is calculated in accordance with the type of request, an impact of

the request, a severity of the request, a criticality of a function affected by the request, and a resolution urgency at the time of receiving the request.”

Therefore, neither Gusick et al, Mangipudi et al., Liao et al., nor Crogger et al., alone or in combination, discloses or suggest all the features of the claims. For at least these reasons, Applicants respectfully request that the rejections be withdrawn.

Mangipudi et al., Liao et al. and Cogger et al.

Claims 1, 3-8, 10-20, 22-28, 30-33, 35-40, 42-50, and 52-67 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Mangipudi et al. alone or further in view of Liao et al. or Cogger et al. Rejections with regard to Mangipudi et al., Liao et al. and Cogger et al. for these claims were discussed above. For at least the reasons discussed above, Applicants respectfully request that this rejection be withdrawn.

Gusick et al., Mangipudi et al., Liao et al. and Jones et al.

Claims 2, 21, 29 and 34 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Gusick et al., Mangipudi et al. and Liao et al. in view of Jones et al. (US Pat. No. 6,219,648). As discussed above, neither Gusick et al., Mangipudi et al. and Liao et al., alone or in combination, disclose or suggest “calculating a priority value for the request, wherein the priority value is calculated in accordance with the type of request, an impact of the request, a severity of the request, a criticality of a function affected by the request, and a resolution urgency at the time of receiving the request.”

Jones et al. fails to fill the gaps. Jones et al. purports to disclose an alerting system for ensuring awareness of pending customer generated trouble tickets which have not been resolved for at least a predetermined time duration corresponding to an escalation level. A customer service center selects the time duration. The alerting system includes a manager module which periodically monitors the pending customer generated trouble tickets and determines whether each pending customer generated trouble ticket remains unresolved for the time duration corresponding to the escalation level. An alerting module sends an alert to a recipient assigned to the escalation level when the manager module determines

the trouble ticket has not been resolved for the time duration corresponding to the escalation level. Neither Jones et al., nor Gusick et al., Mangipudi et al., nor Liao et al., alone or in combination, disclose or suggest the claimed "calculating a priority value, wherein the priority value is calculated in accordance with the type of request, an impact of the request, a severity of the request, a criticality of a function affected by the request, and a resolution urgency at the time of receiving the request." For at least these reasons, Applicants respectfully request that this rejection be withdrawn.

Gusick et al., Mangipudi et al. Liao et al. and Jones et al.

Claim 41 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Gusick et al., Mangipudi et al. and Liao et al. in view of Jones et al. As discussed above, none of the references, alone or in combination, disclose or suggest "calculating a priority value for the request, wherein the priority value is calculated in accordance with the type of request, an impact of the request, a severity of the request, a criticality of a function affected by the request, and a resolution urgency at the time of receiving the request." For at least these reasons, Applicants respectfully request that this rejection be withdrawn.

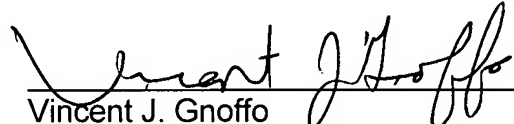
Gusick et al., Mangipudi et al., Liao et al. and Jones et al.

Claim 51 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Gusick et al., Mangipudi et al., and Liao et al. in view of Jones et al. As discussed above, none of the references, alone or in combination, disclose or suggest "calculating a priority value for the request, wherein the priority value is calculated in accordance with the type of request, an impact of the request, a severity of the request, a criticality of a function affected by the request, and a resolution urgency at the time of receiving the request." For at least these reasons, Applicants respectfully request that this rejection be withdrawn.

**Conclusion**

Applicant respectfully requests the allowance of the application. The Examiner is invited to contact the undersigned attorneys for the Applicant via telephone if such communication would expedite this application.

Respectfully submitted,

  
\_\_\_\_\_  
Vincent J. Gnoffo  
Registration No. 44,714  
Attorney for Applicants

BRINKS HOFER GILSON & LIONE  
P.O. BOX 10395  
CHICAGO, ILLINOIS 60610  
(312) 321-4200

November 20, 2007